

## Flores, Priscilla (Feliciano)

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**Sent:** Wednesday, September 24, 2014 1:44 PM  
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**Subject:** Fw: Salt Storage

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----- Forwarded by Davidj Gray/R1/USEPA/US on 09/24/2014 01:43 PM -----

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Date: 01/29/2004 12:14 PM  
Subject: Salt Storage

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Hello All

I have a few questions about salt that I want to pose to the group to see how much common opinion there is.

The questions are:

\* Do you believe unprotected salt piles contaminate stormwater, and runoff from those piles to surface waters pose a potential threat to those surface waters?

\* Do you believe, environmentally, that covering or enclosing salt piles reduces the threat of salt contamination to surface waters, and the environment in general?

\* Do you believe that minimum measure six, pollution prevention at municipal operations, should be interpreted to require that salt piles with runoff to surface waters be sheltered (tarp, leanto, shed...)?

Before you answer, read on.

Background

The issue of salt contamination in the environment has been heating up

around the EPA office lately. The principle reasons for this increased interest is the expansion of I- 93 from 4 lanes to 8 lanes from Salem to Manchester, and, elevated chloride levels in the Cambridge water supply. There have been assertions that I-93 has contributed to surface and/or groundwater contamination, and that doubling the highway will only increase contamination. There are also assertions that some communities in these areas have uncovered salt storage piles and/or poor salt management practices at public works yard.

Several EPA staff involved in these two projects have asked several of us on the MS4 workgroup how the stormwater program and salt storage relate. The A&P2 office has also been asked to get involved in the salt issue.

As you probably know, until last winter, Region 1 believed municipal public works vehicle maintenance operations were required to obtain coverage of the Multi-Sector General Permit (MSGP). The MSGP requires All types of facilities needing the permit to cover any salt piles they have, if the runoff leads to a surface water. Last winter the Region concluded that most municipal vehicle maintenance operations are not required to obtain a MSGP. In New England, most salt piles are stored at municipal and state public works operations.

A&P2 has visited more than 50 public works facilities and conducted dozens of workshop for municipal staff. We have found that the majority of DPWs have a shed or some type of covering over their salt pile, but the majority of all DPWs have lax salt management practices (lack of commitment to keep salt from spilling from under cover etc. , if it is covered).

Thelma, an attorney, and myself have been assigned to evaluate whether Region 1 will "designate" public works operations as requiring a MSGP. We don't yet have an estimate of when this decision will be made. Obviously, if DPWs are Designated, they will have to cover their salt piles. If we do not designate, minimum measure six would be the avenue for EPA/DEP to make our views known. Also, A&P2 has conducted stormwater workshops for DPWs on the MSGP and they are aware of the salt covering requirement within the MSGP.

A reasonable stormwater BMP suggestion to a DPW may be that they institute a salt management policy to reduce spillage and clean up spillage after loading trucks. This suggestion of course would not be relevant if they have no covering for the salt pile itself. Which leads to, how we will comment on salt when doing the MS4 reviews. How would we comment on a salt pile that has no covering versus a pile that is covered? Would we suggest to the facility with a covered pile that they institute improved salt management practices? If so, how would we comment to a facility without a covering over the salt pile?

Around our New England states and other state in the country, Ice melt-salt has been recognized as a contaminant to the fresh water and ground water, and perhaps even saline water. To aid the workgroup in conducting the 6 pilot MS4 reviews, it will be helpful to EPA/DEP (and to the MS4 ) if we have a position on salt storage and salt storage management. I believe It would be confusing if during the MS4 reviews we take a "light" view toward salt storage, and then later designate DPWs and require salt pile covers.

Some Facts to Consider

\* The salt issue will remain visible at least in the near future ( i

think the front office has interest).

- \* All facilities under the MSGP must cover their salt piles if runoff leads to a surface water, except when loading and unloading.
- \* If EPA designates DPWs, salt piles will need to be covered.
- \* CT and other states require salt piles to be covered.
- \* Some MS4 permits require DPWs to develop SWPPPs (presumably would address salt).
- \* Minnesota DOT recognizes salt as an environmental threat  
[http://www.dot.state.mn.us/environment/programs/winter\\_maintenance.html](http://www.dot.state.mn.us/environment/programs/winter_maintenance.html)

I am only the author of this email not the owner of this topic, so share any thoughts you have with the group.

And now the back to the questions....